

DB

IN THE UNITED STATES DISTRICT COURT

INGRID PRINCE
ADVOCATES 4 VICTIMS OF MEDICAL MURDER
DISGUISED AS NATURAL CAUSES

jury del **RECEIVED**

JUN 12 2025 PJJ

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

V

CITY OF CHICAGO
CHICAGO POLICE DEPARTMENT
CHICAGO WATER DEPARTMENT
CHICAGO WATER DEPOT S
SUPERIOR X IN INDIVIDUEAL CAPACITY

8 pages
Exhibit Attached

1:25-cv-06558

Judge Sunil R. Harjani

Magistrate Judge M. David Weisman

RANDOM / Cat. 2

Complaint in federal court—Against CITY OF CHICAGO CHICAGO
POLICE AND WATER DEPARTMENT FOIA—For injunctive relief, declaration
that denial of request for copy of lease was unlawful, attorney's fees, and costs

VERIFIED COMPLAINT

Plaintiff, *INGRID PRINCE*, alleges as follows:

INTRODUCTORY STATEMENT

1. This is an action brought under the **Freedom of Information Act** ("FOIA"), 5 U.S.C.A. § 552, and under the **Administrative Procedure Act** ("APA"), 5 U.S.C.A. §§ 701 et seq. for declaratory and injunctive relief for violations of the above-mentioned Acts and the release of records requested by plaintiff from defendants.

PARTIES

Plaintiff, *INGRID PRINCE*, is a resident of the State of *Florida*. Plaintiff's members reside in or near the City of *Chicago, state of illinois*

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City of Chicago is located at 121 n lasalle and domiciled in the county of cook and state of illinois

Chicago police department is domiciled at 35 s michigan chicago il

The Chicago water department is located at Jackson and State Street Chicago IL 06

The director of Chicago=water department is sued in her official and individual capacity is located at Jackson and State Street Building Chicago IL

, and have an interest in [property interest at 9351 s Ridgeland, 10000 s Union Chicago IL 10004 s Union Chicago IL 60628], in addition to ensuring open, honest governmental activities.

D3. Defendant [CITY OF CHICAGO, CHICAGO WATER DEPARTMENT, CHICAGO POLICE DEPT E] is an agency or instrumentality of the County of Cook and State of Illinois

BACKGROUND INFORMATION

A property tax investor targeted the plaintiff to steal their properties that were fully paid for through the property tax system using his cronies and city and county employees to falsify steal records to gain the deeds of the Prince properties

John Bridge was convicted of RICO charges in the property tax process see Phoenix Bond v John Bridge and all of his companies and partners he uses to steal properties

John Bridge obtained a tax deed on 9351 s Ridgeland Chicago IL 60617 the property was subsequently deeded to Ingrid Prince by Earl Kelly Prince when the two of them arrived at the recorder of deeds they discovered John Bridge's judicial deed

The recorder of deeds told the Prince's owners that they could not record Ingrid Prince's deed unless they got John Bridge's deed reversed

Plaintiff Ingrid Prince hired an attorney to get John Bridge off of the property so that she could get her deed recorded

The trial court ruled that John Bridge's deed on 9351 s Ridgeland Chicago IL 6617 was null and void and was obtained by fraud of John Bridge and his attorney

This process took more than five years in court once the court voided John Bridge's deed she returned to the recorder of deeds and they refused to record her deed advising her that she had to pay over eight thousand dollars for John Bridge's water bill if she didn't she could not record her deed John Bridge's friends at the water department i

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The water department director refused to give the plaintiffs any records of the water on her house and help cloud the title to her house to block her from recording her deed for John Bridge. They allowed him to rack up thousands of dollars on Prince's home while he had the fraudulent deed to it.

The city was repeatedly asked for the records on her properties and they claimed it was the wrong email and refused to give what email they need plaintiff when the request to all emails that could be discovered at the water department and appeal but they refused to give her any records that was requested and caused a cloud over her title to block her recording. Based on information and belief John Bridge has sheriff deputies on his payroll who usher people from their homes without a court order as they did on our other properties located at 10004 S Union Chicago IL and 10000 S Union. Several calls were made to police and police never showed up to the lockout without court orders by the sheriff deputies Mentz and partners. We requested all records and they refused and even began breaking in our homes stealing important papers and property records to cover up our **ownership interest and their and each** other wrongdoing.

The water dept has and continues to conceal the records requested that are not exempt. The Chicago police has and continues to refuse to give the non exempt records requested. All of the city agencies have been given preservation of evidence letters to maintain and not destroy any records in their custody relating to these claims directly or indirectly.

The tenants were never let back in and we requested the records of the eviction and lockout the defendants have and continue to refuse to release one court order with the names of any of the tenants they locked out S Union Chicago IL. He had used proper tax buying **to acquire a** deed on plaintiffs other paid for properties by fraud. It took the plaintiff 5 years in court to get his name off of her property. The circuit court and the Illinois appellate ruled that he obtained a deed on the plaintiffs property by fraud and voided his deeds that he got in the property tax on plaintiffs 9351 S Ridgeland Chicago IL 60617 property.

John Bridge and his cronies targeted 2 more of the plaintiffs fully paid for properties with the help of county and city employees concealing and falsifying the plaintiffs property tax records.

They claimed the plaintiff owed money in which she did not but refused to give the plaintiff copy of her property tax records.

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The plaintiff demanded the records when Mr Kos refused the Attorney General of Illinois ordered him to give plaintiff their property tax records Mr Kos refused to follow the Attorney General's order and give plaintiff her property tax bills

The attorney general made a determination that he violated the law pursuant to both property address above

While the city of Chicago refused to record plaintiff prince deed on her property for years they began transferring the property to other properties based on the failure to pay John Bridges bills after his deed were voided on her house the water

The water department director and recorder of deed attempted to extort plaintiff out of her house it she did not pay John Bridges bills that he accumulated during the time he had fraudulent deed on prince property

Plaintiff has requested all the records but has been refused by his cronies

The plaintiff is entitled to the records on her house the defendants have offered no exemption period in which they relied on in denial

While the defendants refused to release the plaintiff her property tax records they obtained another deed fraudulently A group of investors and sheriff deputies that he used attempted to steal plaintiff home through fraud in the property tax buying process and targeted plaintiff homes because they were paid off

John Bridge the investor in which the court had immediately prior to attempting to steal the two properties at 100004 and 10000

Next the sheriffs came out and locked out all the tenants on two properties with no court order and never let them back in. Next they began to rob the place of all the contents of the two properties that had been there since 1985

ed out and did not allow to return

The defendants also failed to release a copy of the court order on 10000 s union which was not involved in any litigation whatsoever they just had guns and carried out an eviction and lockout without any court order

Plaintiff requested the court orders they refused and did not respond with said orders of video footage of the eviction and lockout. The defendants were also given a request to preserve and do not destroy any records or video of any kind relating to the two properties

The defendants have not shown any exemption to release the records which caused this suit to be filed to enforce the laws of the freedom of information Act laws in which plaintiff requested information pursuant to.

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4. On or about July 17, 2019, defendants [number of acres] acres of property known as [name of site] in [name of state].

5. By letter to defendants dated [June 7, 2019], plaintiffs requested a complete, unredacted copy of the video of the eviction and lockout on both properties they also requested a copy of the court order on 10000 S Union Chicago IL and a court order with the name of all the tenants that they locked out of the two properties/).

6. On June 27, 2019], defendants denied the release of that documents videos and records without citing any exemption they simply failed to produced request

7. Plaintiff filed an administrative appeal on June 27, 2019. Pursuant to Section 552(a)(6)(A)(ii) of Title 5 of the U.S. Code (5 U.S.C. § 552(a)(6)(A)(ii)), defendants had 20 working days after the receipt of the appeal to respond, but failed to do so. (A true and correct copy of plaintiff's appeal is attached to this **complaint** as Exhibit C and incorporated by reference.)

JURISDICTION, VENUE, AND EXHAUSTION OF REMEDIES

8. This court has both subject matter and personal jurisdiction over this matter pursuant to Section 552(a)(4)(B) of Title 5 of the U.S. Code (5 U.S.C. § 552(a)(4)(B)). The court also has jurisdiction over this matter pursuant to Sections 1311 and 1361 of Title 28 of the U.S. Code (28 U.S.C. §§ 1311, 1361) because this **complaint** alleges violations of federal law and seeks to compel defendants to perform duties owed to plaintiff, its members, and members of the public.

9. Venue is proper in this action pursuant to Section 552(a)(4)(B) of Title 5 of the U.S. Code (5 U.S.C. § 552(a)(4)(B)) because the claimant resides and the agency records are situated in this judicial district. Venue is also proper in this action under Section 1319(e) of Title 28 of the U.S. Code (28 U.S.C. § 1319(e)) because a substantial part of the events giving rise to this proceeding were committed in this judicial district.

10. Plaintiff has exhausted each and every exhaustion-of-remedies requirement that must be satisfied to maintain this proceeding.

FIRST CLAIM

Failure to Disclose Public Records under the Freedom of Information Act

11. Paragraphs 1 through 10 of this **complaint** are fully incorporated into this paragraph.

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12. Plaintiff properly requested a complete, unredacted copy of her property taxes and Application for senior exemption original application with all supporting documents and signature pages.

13. Defendants improperly withheld a complete, unredacted copy of that document on the grounds that it might or did contain confidential business **information** and might be or is a contract proposal. That document is not protected from disclosure by either of the provisions cited by defendants.

14. Plaintiff exhausted all administrative remedies by filing an administrative appeal. Defendants did not respond to the appeal within the time allotted by law.

15. Plaintiff was harmed as a result of defendants' violation of FOIA because plaintiff has been denied the rights and protections provided under that law.

SECOND CLAIM

Failure to Comply with Administrative Procedure Act

16. Paragraphs 1 through 15 are fully incorporated into this paragraph.

17. Defendants are required to comply with FOIA and have an obligation to release public records on request under Section 552 of Title 5 of the U.S. Code (5 U.S.C. § 552).

18. Defendants' refusal to release the requested document was arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with the law, and the refusal was not supported by sufficient evidence under Section 706 of Title 5 of the U.S. Code (5 U.S.C.A. § 706).

19. Plaintiff was harmed as a result of defendants' violation of FOIA and the APA because plaintiff has been denied the benefits and protections provided by compliance with those laws.

REQUEST FOR RELIEF

WHEREFORE, plaintiff requests the following relief against defendants:

1. A judgment determining or declaring that defendants' failure to provide plaintiff with the requested document was unlawful;

2. Injunctive relief requiring defendants to provide plaintiff with the requested document;

3. All attorney's fees and costs incurred by plaintiff in connection with this proceeding as provided by Section 552(a)(4)(E) of Title 5 of the U.S. Code (5 U.S.C.A. § 552(a)(4)(E)); U.S.C.A. §§ 552 et seq., the court may assess against the United States reasonable attorney's fees and other litigation costs reasonably incurred. Federal law provides that when an action is brought under the **Freedom of Information Act**, 5 occurred, whenever the **complainant** substantially prevails; a **complainant** substantially prevails if the **complainant** obtains relief (1) through a judicial order, or an enforceable written agreement or consent decree, or (2) a voluntary or unilateral change in position by the agency, if the **complainant's** claim is not insubstantial. 5 U.S.C.A. § 552(a)(4)(E).t's Key Number Digest, Records67

4. Any and all other relief that may be granted pursuant to FOIA or the APA but not explicitly or specifically requested elsewhere in this request for relief; and

5. Any and all other and further relief that this court may deem appropriate.

/s/ Ingrid Prince

P o box 192344 Miami beach 33119 +

7722841667

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OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS

KWAME RAOUL
ATTORNEY GENERAL

June 20, 2019

Ms. Ingrid Prince
P.O. Box 19344
Miami Beach, Florida 33119

RE: FOIA Request for Review - 2019 PAC 58505; INCOMPLETE

Dear Ms. Prince:

The Public Access Bureau has received your correspondence asking us to review the Cook County Sheriff's Office (Sheriff's Office) denial of your Freedom of Information Act (FOIA) request. Under section 9.5(a) of FOIA¹ a Request for Review must be made in writing and signed by the requester. The request must also include both:

- 1) a copy of the FOIA request that you submitted to the public body; and
- 2) any response(s) that you received from the public body.

Your correspondence did not include a copy of the public body's response you received. Please send us the missing information as soon as possible.

Section 9.5(a) of FOIA further provides that a request for review must be filed with the Public Access Counselor "not later than 60 days after the date of the final denial" of a FOIA request. This office must receive the missing information within 60 days after the public body's final denial. If we do not receive this additional information, we will not have authority to review this matter and this incomplete file will be closed without further action or notification to you.

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¹5 ILCS 140/9.5(a) (West 2016).

CITY OF CHICAGO Freedom of Information Request					
Requester's Name	Ingrid & Earl Kelly Prince		Address	p o box 192344	
Telephone Number	3053404468		City	miami beach	State FL Zip 33119
Fax Number			Email	electricityworld67@gmail.com	
Organization (if any)					
Records sought (be specific): "WILL PICK UP IN PERSON"					
property address: 10000 S Union, Chicago Illinois 60628					
please send an itemized copy of water bills for the following years:					
2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019					
2. please send a itemized copy of any liens or judgments amounts and numbers for all years listed above.					
3. please list a copy of any case number in which legal action was taken for the property for all the years listed above.					
4. please give an itemized list of any shut offs or disconnections including dates for each disconnection or cutoff.					
If you are unable to provide records requested please state your itemized reasoning noted on in your serial for each year requested.					
please provide a copy of your appeal information.					
<input type="checkbox"/> This request is being made for a commercial purpose. Section 2(6-10) of FOIA defines "commercial purpose" as the use of any part of a public record or records, or information derived from public records, in any form for sale, resale, or solicitation or advertisement for sales or services. For purposes of this definition, requests made by news media and non-profit, scientific, or academic organizations shall not be considered to be made for a "commercial purpose" when the principal purpose of the request is (i) to access and disseminate information concerning news and current or passing events, (ii) for articles of opinion or features of interest to the public, or (iii) for the purpose of academic, scientific, or public research or education.					
<input checked="" type="checkbox"/> This request is not being made for a commercial purpose.					
Signature (Ingrid & Earl Prince)					
(For optional use only)					

original 6/13/19

Resent Copy

6/17/19

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2

Sanchez, Lidia

#58733
Mitica

From: medical assassination investigation s <electricityworld67@gmail.com>
Sent: Thursday, June 27, 2019 3:49 PM
To: Public Access; susan cunliffe
Subject: 10000 s UNION APPEAL WATER DEPARTMETN
Attachments: 10000 union response.pdf; 10000 s union request.pdf

Sarah Pratt, Public Access

Counselor,

Sarah Pratt, Public Access

Counselor,

this appeal is filed because the city of chicago department of water has refused to give me copies of bills on my property located at 10000 S UNOIN CHICAGO IL 60628.

the water department of Chicago are using these said bills to cloud the title of my property.

the water department has given me this email address to request said documents.

the water department has not cited any exemptions in which they are exempt for sending copies of itemized bills, judgements and liens for the ylears requested in my rfoia

the water department has acted in conspiracy with jiohn bridge to conceal these records in an effort interfere with my abilty to sell or rent my home and the financial gain therefrom.

I am entitled to the records of my home and appeal from their denial of my request

june 27, 2019

Ingrid prince

**WILL PICK UP ALL CORRESPONDENCE IN PERSON AT ATTORNEY GENERAL
OFFICE IN CHICAGO DOWNTOWN. NO EXCEPTIONS**

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DEPARTMENT OF WATER MANAGEMENT
CITY OF CHICAGO

June 25, 2019

Ingrid and Earl Kelly Prince
PO Box 192344
Miami Beach, FL 33119

FREEDOM OF INFORMATION

RE: 19-FR-633

Dear Ingrid and Earl Kelly Prince,

On behalf of the City of Chicago Department of Water Management, I am responding to your Freedom of Information Act ("FOIA") request received in our office on June 18, 2019 for the following documents:

"property address: 10000 S Union, Chicago, Illinois, 60628 please send an itemized copy of water bills for the following years: 2010; 2011; 2012; 2013; 2014; 2015; 2016; 2017; 2018; 2019 2. please send a itemized copy of any liens or judgements for all for all years listed above: 3. please list a copy of any case number in which legal action was taken for the property for all the years listed above. 4. please give an itemized list of any shut offs or disconnections including dates for each disconnection or cutoff If you are unable to provide records requested please cite your itemized exemptionu relied on in your denial for each year requested. please provide a copy of your appeal information."

For the first request above and the numbered requests 2, 3 and 4 the Department of Water Management has no responsive documents. The provided address 10000 S Union does not exist in our system.

For your request for "a copy of your appeal information" FOIA requests that have been denied have a right of review by the Illinois Attorney General's Public Access Counselor, who can be contacted at 500 S. Second St., Springfield, IL 62706 or by telephone at (217) 558-0486. You also have the right to seek judicial review of a denial by filing a lawsuit in Cook County Circuit Court.

Sincerely,

Angel Hawthorne
Freedom of Information Office
Department of Water Management
DWMFoia@cityofchicago.org

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1000 EAST OHIO STREET, CHICAGO, ILLINOIS 60611

CITY OF CHICAGO Freedom of Information Request								
Requester's Name	Tyndal & Emily Prince		Address: p.o box 192344					
Request ID	3053404468		City	miami beach	State	FL	Zip	33119
Fax Number			Email: electricityworld87@gmail.com					
Organization (if any)								
Records sought (be specific): *WILL PICK UP IN PERSON*								
property address: 9351 s ridge and, chicago, illinois, 60617								
Please send an itemized copy of water bills for the following years:								
2010; 2011; 2012; 2013; 2014; 2015; 2016; 2017; 2018; 2019								
2. please send a itemized copy of any liens or judgements for all years listed above.								
3. please send a copy of any case number in which legal action was taken for the property for all the years listed above.								
4. please give an itemized list of any shut offs or disconnections including dates for each disconnection or shut off.								
If you are unable to provide records requested above please cite your records & exemptions, what is in your denial for each year requested.								
Please provide a copy of your apprais information.								
<input type="checkbox"/> This request is being made for a commercial purpose. Section 2(c)(10) of FOIA defines "commercial purpose" as the use of any part of a public record or records, or information derived from public records, in any form for sale, resale, or solicitation or advertisement for sales or services. For purposes of this definition, requests made by news media and non-profit, scientific, or academic organizations shall not be considered to be made for a "commercial purpose" when the principal purpose of the request is (i) to access and disseminate information concerning news and current or passing events, (ii) for articles of opinion or features of interest to the public, or (iii) for the purpose of academic, scientific, or public research or education.								
<input checked="" type="checkbox"/> This request is not being made for a commercial purpose.								
Signature (Prince exp Prince)								
(For official use only)								

RESENT Copy

6/17/19

Original

6/13/19

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5

1004 S UNION WATER APPEAL



medical assassination investigation s <electricityworld67@gmail.com>

10004 S UNION WATER APPEAL

1 message

Thu, Jun 27, 2019 at 4:22 PM

medical assassination investigation s <electricityworld67@gmail.com>

To: publicaccess@atg.state.il.us, susan.cunliffe <electricityworld67@gmail.com>

Sarah Pratt, Public Access

Counselor

this appeal is filed because the city of chicago department of water has refused to give me copies of bills on my property located at 10004 S UNION CHICAGO IL 60628
the water department of Chicago are using these said bills to cloud the title of my property.
the water department has given me this email address to request said documents
the water department has not cited any exemptions in which they are exempt for sending copies of itemized bills, judgements and liens for the years requested in my rfoia

the water department has acted in conspiracy with john bridge to conceal these records in an effort to interphere with my ability to sell or rent my home and the financial gain therefrom.
I am entitled to the records of my home and appeal from their denial of my request

june 27, 2019

Ingrid prince

WILL PICK UP ALL CORRESPONDENCE IN PERSON AT ATTORNEY GENERAL
OFFICE IN CHICAGO DOWNTOWN. NO EXCEPTIONS. MY EMAIL IS HACKED AND MAIL
CONSISTENTLY MISSING

2 attachments

10004 s union request water.pdf
165K

10004 s union response.pdf
96K

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#58731

Initial

anchez, Lidia

From: medical assassination investigation s <electricityworld67@gmail.com>
Sent: Thursday, June 27, 2019 3:23 PM
To: Public Access; susan cunliffe
Subject: 10004 S UNION WATER APPEAL
Attachments: 10004 s union request water.pdf, 10004 s union response.pdf

Sarah Pratt, Public Access

Counselor,

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CONSISTENTLY MISSING**

2025 JUN 12 PM 3:18

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DEPARTMENT OF WATER MANAGEMENT
CITY OF CHICAGO

June 25, 2019

Ingrid and Earl Kelly Prince
PO Box 192344
Miami Beach, FL 33119

FREEDOM OF INFORMATION

RE: 19-FR-632

Dear Ingrid and Earl Kelly Prince,

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For your request for *"an itemized copy of water bills ..."* the Department of Water Management has no responsive documents.

Please note that each City department is a public body under Section 2 of FOIA, 5 ILCS 140/2(a). See *Duncan Publishing, Inc. v. City of Chicago*, 1281, 1286 (1ST Dist. 1999) (Clearly, each of the individual departments are subsidiary bodies of the City and are public bodies as defined by the FOIA.) A FOIA request must be directed to the department that maintains the records you are seeking.

For your request for *"a itemized copy of any liens or judgements for all years listed above..."* the Department of Water Management has no responsive documents. The department has no records of liens or judgements.

Please note that each City department is a public body under Section 2 of FOIA, 5 ILCS 140/2(a). See *Duncan Publishing, Inc. v. City of Chicago*, 1281, 1286 (1ST Dist. 1999) (Clearly, each of the individual departments are subsidiary bodies of the City and are public bodies as